

10. The Defendant's failure to make a determination of Plaintiff's application within the 120 day statutory period allows Plaintiff to bring the matter to this Court for a hearing pursuant to 8 U.S.C. § 1447(b).

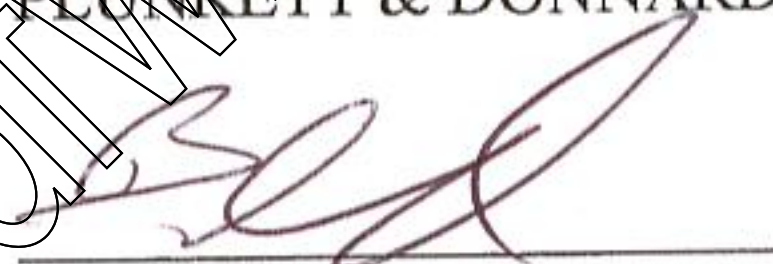
11. Plaintiff desires a judicial determination of his naturalization application and a declaration that he is entitled to be naturalized as a citizen of the United States. A period in excess of one year should be more than sufficient time to complete the security check and adjudicate this application.

WHEREFORE, in view of the arguments and authority noted herein, Plaintiff respectfully requests that, upon due consideration, the Court agree to hear Plaintiff's case and render a declaratory judgment that he is entitled to be naturalized, and grant such other relief as justice may require.

Respectfully submitted,

Dated: 22 August 2007

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